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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACQUELINE FROEHLICH-L'HEUREAUX,

Defendant.

NO. CR 07-0337 MHP

**STIPULATION AND ~~[PROPOSED]~~ ORDER
UNSEALING THE APPLICATION FOR
PERMISSION TO ENTER PLEA OF GUILTY**

The United States of America, by and through its attorney Assistant United States Attorney Kyle F. Waldinger, and the defendant Jacqueline Froehlich-L'Heureaux, by and through her attorney Leland B. Altschuler, hereby stipulate and agree that the Application for Permission to Enter Plea of Guilty in this matter may be unsealed. In further support of this request, the parties state as follows:

1. The defendant entered her plea of guilty in open Court on June 4, 2007. At that time, the Court ordered that the plea-related materials be filed under seal.

2. Since that time, the United States has obtained an Indictment charging the defendants David Nosal and Becky Christian with numerous offenses. That case is numbered CR 08-0237 MHP. Christian's case is set for trial on August 5, 2008.

3. The government intends to produce the defendant Jacqueline Froehlich-

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1 L'Heureaux's Application for Permission to Enter Plea of Guilty to the defendants Nosal and
2 Christian because it contains statements of the defendant. Before doing so, the United States
3 seeks to unseal that application. (The Court previously unsealed the plea agreement.)

4 4. Accordingly, for the reasons stated above, the parties stipulate and agree that the
5 defendant Jacqueline Froehlich-L'Heureaux's Application for Permission to Enter Plea of Guilty
6 should be unsealed. For purposes of clarity, the parties jointly request that the Court unseal the
7 docket entries numbered 5 through 7, which all pertain to the defendant's entry of plea.

8 SO STIPULATED.

9 DATED: July 8, 2008

BRIAN J. STRETCH
Acting United States Attorney

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12 /s/
KYLE F. WALDINGER
Assistant United States Attorney

14
15 DATED: July 8, 2008

/s/
LELAND B. ALTSCHULER
Attorney for defendant Jacqueline Froehlich-
L'Heureaux

18 ~~PROPOSED~~ ORDER

19 Good cause appearing therefor, it is hereby ordered that the Application for Permission to
20 Enter Plea of Guilty filed in this matter on or about June 4, 2007 is UNSEALED. The Court
21 further orders that the docket entries 5 through 7 be UNSEALED.

22 DATED: July 9, 2008

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24 MARILYN HAYES PATEL
UNITED STATES DISTRICT COURT



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28 STIPULATION AND [PROPOSED] ORDER
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